

Exhibit 7

01:34:24 1 A. Yeah. I would say put it in reverse and wasn't going
01:34:29 2 slow. I mean, obviously had intentions of getting out
01:34:32 3 of there in a hurry.

01:34:37 4 Q. Okay. And did you see the reverse indicator lights on
01:34:41 5 the woman's car come on when it started to back up?

01:34:46 6 A. Yes, sir.

01:34:47 7 Q. Okay. Okay. And did that officer that got hit by the
01:34:55 8 woman's car fall to the ground?

01:34:57 9 A. Yes, sir.

01:35:00 10 Q. Okay. Did you see that driver's side front tire roll
01:35:04 11 over the officer?

01:35:06 12 A. Yes, sir. I did.

01:35:08 13 Q. Okay. And when it rolled over the officer, did the car
01:35:11 14 stop on the officer at any point?

01:35:13 15 A. No, sir. It rolled right off.

01:35:20 16 Q. Okay. So there was no point in time where the car
01:35:25 17 stopped or slowed down even while it was running over
01:35:28 18 that officer's body?

01:35:29 19 A. It ran over it and then right when it got off of it, it
01:35:34 20 kind of halted to a stop.

01:35:37 21 Q. Okay. And when it halted to a stop, it had driven over
01:35:41 22 the officer's portion of -- whatever portion of the
01:35:44 23 body of the officer that had been run over; is that
01:35:47 24 correct?

01:35:47 25 A. Yes, sir.

02:19:43 1 car -- by the car and fell to the ground, he started to
02:19:46 2 crawl away to safety?

02:19:48 3 A. Uh-huh.

02:19:49 4 Q. Yes? Is that a yes?

02:19:51 5 A. Yes, ma'am.

02:19:52 6 Q. Okay. And then you said that's when the other officer
02:19:54 7 said something to the effect of, "Lady, stop or I'll
02:19:58 8 open fire," and then he started shooting; is that
02:20:01 9 correct?

02:20:02 10 A. Yes, ma'am.

02:20:02 11 Q. So when you see the officer started crawling away to
02:20:06 12 safety, what do you mean by that?

02:20:08 13 A. He was trying to get out of the lady's, I guess,
02:20:12 14 projected way to go from -- he tried to get away from
02:20:16 15 the tire or vehicle.

02:20:18 16 Q. Okay. And then I think earlier you said the officer
02:20:25 17 moved out of the way before the car moved forward; is
02:20:28 18 that correct?

02:20:29 19 A. Yes. Yes, ma'am.

02:20:30 20 Q. Okay. So would it be accurate to say that the officer
02:20:33 21 who was on the ground was not in the direct pathway of
02:20:36 22 the vehicle when it started to move forward?

02:20:39 23 A. Yes, ma'am.

02:20:41 24 MR. PATEL: Objection. Misstates prior
02:20:43 25 testimony.

02:20:45 1 BY MS. LE:

02:20:49 2 Q. And then earlier, you said that when the car started to

02:20:51 3 move forward, it was moving at approximately 5 to

02:20:56 4 10 miles per hour; is that correct?

02:20:59 5 A. Yes, ma'am.

02:20:59 6 Q. Okay. I'm going to play that portion of your audio

02:21:03 7 interview again, just see if this refreshes your

02:21:06 8 recollection.

02:21:06 9 Is that okay?

02:21:07 10 A. Yes, ma'am.

02:21:09 11 Q. Okay. Let me just skip to the correct time stamp. So

02:21:36 12 this is CRO001249, and this was the original clip that

02:21:41 13 was produced in discovery. And I'm going to be

02:21:43 14 starting this audio clip at 11:21. And let me know if

02:21:46 15 you can't hear it.

02:21:50 16 (Audio recording plays.)

02:22:04 17 BY MS. LE:

02:22:05 18 Q. And I've stopped the audio clip at 11:36?

02:22:09 19 Mr. Bell, were you able to hear that?

02:22:11 20 A. Yes, ma'am, I was.

02:22:12 21 Q. Okay. And did you hear yourself say that when it

02:22:15 22 rolled forward, it was going about two miles per hour?

02:22:18 23 A. Yes, ma'am.

02:22:18 24 Q. And does that refresh your recollection of how fast the

02:22:21 25 car was going when it moved forward?

02:22:24 1 A. Yes, ma'am.

02:22:25 2 Q. Okay.

02:22:30 3 MS. LE: That's all the questions I have.

02:22:32 4 Thank you.

02:22:37 5 MR. PATEL: I'll have some more on redirect
02:22:39 6 for you here, Richard. I just want to clarify some
02:22:47 7 stuff.

02:22:47 8

02:22:47 9 REDIRECT EXAMINATION

02:22:48 10 BY MR. PATEL:

02:22:49 11 Q. Okay. So you went -- you just gave testimony that the
02:22:52 12 officer that had gotten hit by the car and fell to the
02:22:55 13 ground began to crawl away before the vehicle moved
02:22:59 14 forward; is that correct?

02:23:00 15 A. Yes, sir.

02:23:01 16 Q. Okay. Had that officer, in your opinion, crawled out
02:23:07 17 of the way enough to prevent the possibility of that
02:23:10 18 vehicle still hitting him as it moved forward?

02:23:14 19 A. Yes, sir.

02:23:19 20 Q. Okay. Isn't it true that earlier, you gave testimony
02:23:21 21 that there was still a possibility that the vehicle
02:23:24 22 could hit officer because of the path that the vehicle
02:23:26 23 was taking and where the officer was?

02:23:29 24 MS. LE: Objection. Misstates prior
02:23:30 25 testimony.

02:23:34 1 BY MR. PATEL:

02:23:34 2 Q. You can answer, Richard, if you have a response.

02:23:38 3 A. Oh, um, it -- it very well could have, but from where I

02:23:44 4 was sitting and from where I could see, I would say he

02:23:49 5 was out of the way enough to not get ran over again.

02:24:09 6 Q. All right. Give me one second. Just looking over my

02:24:14 7 notes.

02:24:17 8 Okay. Richard, give me one second, okay?

02:24:19 9 A. Yes, sir.

02:24:21 10 MR. PATEL: All right. Everyone, is it okay

02:24:25 11 if we go off the record real quick so I can take a look

02:24:28 12 at my notes and get an exhibit ready?

02:24:31 13 MS. LE: Sure, no problem.

02:24:32 14 MR. PATEL: Thank you.

02:24:32 15 THE VIDEOGRAPHER: All right. The time is

02:24:34 16 2:24 p.m. Pacific Time. We are now off the record.

02:24:37 17 (Off the record.)

02:24:37 18 (On the record.)

02:30:04 19 THE VIDEOGRAPHER: The time is 2:30 p.m.

02:30:08 20 Pacific Time and we are now back on the record.

02:30:10 21 BY MR. PATEL:

02:30:11 22 Q. Richard, do you recall that exhibit that I had you take

02:30:14 23 a look at where I circled where you believed your car

02:30:19 24 was located when you stopped when you witnessed this

02:30:21 25 incident?

02:34:15 1 RECROSS-EXAMINATION

02:34:15 2 BY MS. LE:

02:34:16 3 Q. So your -- I think you testified that the car looked

02:34:20 4 like it was trying to leave the scene, and that it

02:34:23 5 would have to turn left or in a northern direction in

02:34:26 6 order to leave; is that correct?

02:34:28 7 A. Yes, ma'am.

02:34:28 8 Q. Okay. At any time between the time the car started

02:34:32 9 moving forward and after it hit the car and stops for

02:34:36 10 the final time, did you ever see the car make a turn?

02:34:40 11 A. No, ma'am.

02:34:41 12 Q. Okay. Was it generally moving in a straight direction

02:34:45 13 the entire time?

02:34:46 14 A. Yes, ma'am.

02:34:47 15 Q. Okay. That's all the questions I have.

02:34:49 16 Thank you.

02:34:53 17 THE VIDEOGRAPHER: All right. Then while

02:34:55 18 we're still on the record, I'd just like to get video

02:34:59 19 orders.

02:34:59 20 Mr. Patel, I have you down for a standard

02:35:04 21 video. Would you like that synced?

02:35:09 22 MR. PATEL: Yes, we would. I'm just looking

02:35:11 23 at my notes. Make sure I don't have anything else.

02:35:17 24 All right. If we go off the record? Just

02:35:19 25 give me a couple minutes here.

RICHARD BELL
FEBRUARY 27, 2024

JOB NO. 881053

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I, Richard Bell, have read the foregoing
deposition transcript and by signing hereafter, subject to
any changes I have made, approve same.

Dated _____.

RICHARD BELL

1 CERTIFICATE OF REPORTER

2 I, APRIL D. BIEDERMANN, Washington State Certified
3 Court Reporter and NCRA Registered Skilled Reporter, do
hereby declare:

4 That prior to being examined, the witness named in
5 the foregoing deposition was by me duly sworn pursuant to
6 Section 30(f)(1) of the Federal Rules of Civil Procedure and
the deposition is a true record of the testimony given by
the witness.

7 That said deposition was taken down by me in
8 shorthand at the time and place therein named and thereafter
reduced to text under my direction.

9 XX That the witness requested to review the
10 transcript and make any changes to the transcript
as a result of that review pursuant to Section
11 30(e) of the Federal Rules of Civil Procedure.

12 Signature is waived.

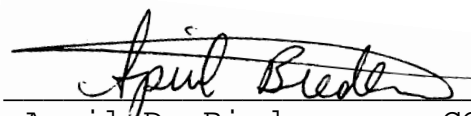
13 The changes made by the witness are appended to
the transcript.

14 No request was made that the transcript be
15 reviewed pursuant to Section 30(e) of the Federal
Rules of Civil Procedure.

16 I further declare that I have no interest in the
17 event or the action.

18 I declare under penalty of perjury under the laws
of the United States of America that the foregoing is true
19 and correct.

20 Witness my hand this 14th day of March, 2024.

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22 

23 April D. Biedermann, CCR, RSR
24 WA CCR No. 21028823
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